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7 Attorneys for Defendant  
ViacomCBS Inc., f/k/a CBS Corporation, a  
8 Delaware corporation, f/k/a Viacom Inc.,  
successor by merger to CBS Corporation, a  
9 Pennsylvania corporation, f/k/a Westinghouse  
Electric Corporation

11 **UNITED STATES DISTRICT COURT**  
12 **NORTHERN DISTRICT OF CALIFORNIA**

14 ROSEMARY ELORREAGA individually  
and as Successor-in-Interest to ROBERTO  
15 ELORREAGA; ROBERT PAUL  
ELORREAGA; RICHARD ANDREW  
16 ELORREAGA; and RONALD EDWARD  
ELORREAGA,

17 Plaintiffs,

18 vs.

19 ABB, INC., et al.,

20 Defendants.  
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Case No: 4:21-cv-05696-HSG

**STIPULATION AND ORDER OF DISMISSAL  
OF DEFENDANT VIACOMCBS INC., WITH  
PREJUDICE**

Judge: Hon. Haywood S. Gilliam, Jr.  
Courtroom: 2

Complaint Filed: September 23, 2020  
Date Removed: July 26, 2021  
Trial Date: TBD

**TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** pursuant Section 41(a)(1)(A)(ii), Plaintiffs Rosemary Elorreaga, individually and as Successor-in-Interest to Roberto Elorreaga, Roberto Elorreaga, Robert Paul Elorreaga, Richard Andrew Elorreaga, and Ronald Edward Elorreaga (“Plaintiffs”) and Defendant ViacomCBS Inc., f/k/a CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation (“Westinghouse”) hereby stipulate as follows:

**WHEREAS:**

1. On September 23, 2020, Plaintiffs initiated this action against Westinghouse in the Superior Court of California, County of San Francisco.
2. On July 26, 2021, matter was removed to United States District Court, Northern District of California.
3. On February 19, 2025, Plaintiffs and Westinghouse reached a settlement agreement whereby Plaintiffs agreed to dismiss all claims against Westinghouse with prejudice.
4. Plaintiffs and Westinghouse agree that the Court will retain jurisdiction to enforce their settlement agreement.

**THE PARTIES HEREBY STIPULATE AS FOLLOWS:**

5. The Court should dismiss this matter in its entirety against Defendant ViacomCBS Inc., f/k/a CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation, only, with prejudice and the Court will retain jurisdiction to enforce their settlement agreement.

Dated: March 10, 2025

GOLD LAW FIRM

By: /s/ Roger E. Gold

ROGER E. GOLD

Attorneys for Plaintiffs

Rosemary Elorreaga, individually and as Successor-in-Interest to Roberto Elorreaga, Roberto Elorreaga, Robert Paul Elorreaga, Richard Andrew Elorreaga, and Ronald Edward Elorreaga

1 Dated: March 10, 2025

JONES & BENDON, LLP

2  
3 By: /s/ H.W. Trey Jones

H.W. TREY JONES

Attorneys for Plaintiffs

4 Rosemary Elorreaga, individually and as Successor-in-  
Interest to Roberto Elorreaga, Roberto Elorreaga, Robert  
5 Paul Elorreaga, Richard Andrew Elorreaga, and Ronald  
6 Edward Elorreaga

7  
8 Dated: March 10, 2025

JAMISON EMPTING CRONIN, LLP

9  
10 By: /s/ Kevin D. Jamison

KEVIN D. JAMISON

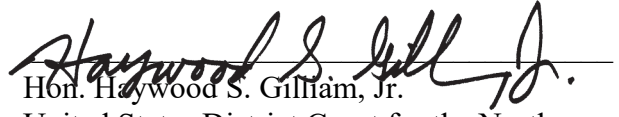
Attorneys for Defendant

11 ViacomCBS Inc. (n/k/a Paramount Global), f/k/a CBS  
Corporation, a Delaware corporation, f/k/a Viacom Inc.,  
12 successor by merger to CBS Corporation, a  
13 Pennsylvania corporation, f/k/a Westinghouse Electric  
Corporation

ORDER

Having read and considered the foregoing stipulation of the parties, and for cause appearing:  
PURSUANT TO STIPULATION, IT IS SO ORDERED that Defendant ViacomCBS Inc., f/k/a CBS Corporation, a Delaware corporation, f/k/a Viacom Inc., successor by merger to CBS Corporation, a Pennsylvania corporation, f/k/a Westinghouse Electric Corporation, only, is dismissed with prejudice from the above-titled action in its entirety and the Court will retain jurisdiction over the settlement agreement between Westinghouse and Plaintiffs Rosemary Elorreaga, individually and as Successor-in-Interest to Roberto Elorreaga, Roberto Elorreaga, Robert Paul Elorreaga, Richard Andrew Elorreaga, and Ronald Edward Elorreaga.

Dated: 3/11/2025

  
Hon. Haywood S. Gilliam, Jr.  
United States District Court for the Northern  
District of California